IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| ML FASHION, LLC, and ML RETAIL, |) | |
|---------------------------------|---|------------------------|
| Plaintiffs, |) | Case No. 1:20-cv-05124 |
| v. |) | |
| |) | Hon. Steven C. Seeger |
| NOBELLE GL, LLC, STEPHANIE |) | |
| MENKIN, SARIT MAMAN NARANI, and |) | |
| NICOLAS GOUREAU, |) | |
| |) | |
| Defendants. |) | |

AFFIDAVIT OF LAUREN GREENE, ESQ. IN SUPPORT OF DEFENDANTS' MOTION FOR AN ORDER AWARDING SANCTIONS UNDER 28 U.S.C. § 1927 AND THE COURT'S INHERENT AUTHORITY

I, Lauren Greene, do hereby declare and state as follows:

- 1. I am an attorney in the law firm of Gerard Fox Law, P.C., in Los Angeles, California, and one of Defendants' counsel in the above-captioned litigation. I am over eighteen years of age and competent to give this affidavit. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would competently testify thereto.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of a complaint filed on April 9, 2021 in *ML Fashion, LLC, et al., v. Nobelle GW, LLC, et al.*, No. 3:21-cv-00499-JCH, in the United States District Court of the District of Connecticut.
- 3. Attached hereto as Exhibit 2 is a true and correct copy of an email chain including the following communications:
 - a. An email from Robyn E. Marsh, Esq. to Jessica J. Ramos, dated February 23, 2021;

b. An email from Robyn E. Marsh, Esq. to Jessica J. Ramos, dated March 11, 2021;

and

c. An email from Jessica J. Ramos to Robyn E. Marsh, Esq., and others, dated March

15, 2021.

4. Attached hereto as Exhibit 3 is a true and correct copy of a complaint filed on March

25, 2021 in MLG Retail LLC v. JuJu's Kids Boutique LLC, et al., No. 21L00000232, in the Circuit

Court of the Nineteenth Judicial Circuit, Lake County, Illinois.

5. Attached hereto as Exhibit 4 is a true and correct copy of a complaint filed on March

1, 2021 in ML Properties, LLC, et al., v. Precise Graphix, LLC, et al., No. 5:21-cv-00984, in the

United States District Court for the Eastern District of Pennsylvania.

Attached hereto as Exhibit 5 is a true and correct copy of an article entitled 6.

"Exclusive: 20 Business Owners Claim There's a Dark Side to Marcus Lemonis's Reality TV

Show 'The Profit,'" Inc., (Aug. 13, 2018), available at https://www.inc.com/will-yakowicz/dark-

side-of-marcus-lemonis-reality-tv-show-the-profit.html (accessed March 22, 2021).

I declare under penalty of perjury under the laws of the United States that the foregoing is

true and correct.

Dated: April 12, 2021

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